

Juror ID: _____

DRAFT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

SEAN COMBS,
a/k/a “Puff Daddy,”
a/k/a “P. Diddy,”
a/k/a “Diddy,”
a/k/a “PD,”
a/k/a “Love,”

Defendant.

S3 24 Cr. 542 (AS)

JURY QUESTIONNAIRE

PRELIMINARY INSTRUCTIONS

Please read the following instructions carefully before completing any portion of this questionnaire. Please print your juror number in the space provided at the top of each page. **Do not write your name on the questionnaire.** Please answer each and every question fully. Some questions have more than one part.

YOU ARE SWORN TO GIVE TRUE AND COMPLETE ANSWERS TO ALL QUESTIONS IN THIS QUESTIONNAIRE. This questionnaire is designed to help simplify and shorten the jury selection process. The purpose of the questionnaire is to determine whether prospective jurors can decide this case impartially based upon the evidence presented at trial and the legal instructions given by the presiding judge. The questions are not intended to inquire unnecessarily into personal matters. Although some of the questions may appear to be of a personal nature, please understand that the Court and the parties must learn enough information about each juror’s background and experiences to select a fair and impartial jury.

Please answer all questions to the best of your ability. If you do not know the answer to a question, then write, “I don’t know.” There are no “right” or “wrong” answers, only truthful answers. If you have strong feelings about this case in general, please do not hesitate to share them. Although you may be a perfectly good juror in another case, this may or may not be the right case for you to sit as an impartial juror. Both parties have the right to get honest answers and to hear your true opinions. Remember, you are sworn to give true and complete answers to all questions.

DO NOT DISCUSS YOUR QUESTIONS AND ANSWERS OR THE CASE WITH ANYONE NOW OR UNTIL FURTHER INSTRUCTED BY THE COURT. You should not discuss the questions or answers with fellow jurors. It is very important that your answers be your own individual answers. More broadly, do not discuss the case with anyone, including the lawyers (except in the presence of the Court), your fellow jurors, your family, your friends, or anyone else. Do not communicate about the case in any way, including telephone, e-mail, any social media app

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or website (such as Facebook), and communications app or website (such as X). You must also avoid reading or hearing about the case (or anyone participating in the case) in newspapers, in magazines, on the radio or television, on social media, or on the Internet.

DO NOT DO YOUR OWN RESEARCH ON THE CASE. Do not conduct any research into the case (or anyone participating in the case) at any time before your entire jury service has been completed. That includes performing Internet or social media searches, asking other people about the case, reading news stories, books, or reports about the case, or watching films, television, or streaming programs that relate to the case. Do not read, watch, or listen to any information about this case.

Your name will not be disclosed or connected to this questionnaire beyond the Judge and the parties in this case. However, if you believe that any of your answers contain private information that could embarrass you or otherwise seriously compromise your privacy and wish to request that the Court keep them confidential and not distribute them beyond the Judge and the parties, please indicate the particular question number at the end of the questionnaire.

SUMMARY OF THE CASE

The Court is selecting a jury for a trial commencing on Monday, May 12, 2025. Although it is never possible to predict the length of a trial, currently this trial is expected to last approximately eight weeks.

This is a criminal case. The defendant, Sean Combs, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” has been charged in an Indictment with various criminal offenses. The Indictment is not evidence. It simply contains the charges—referred to as “counts”—that the Government intends to prove to the jury at trial beyond a reasonable doubt.

The charges in the Indictment stem from allegations that from at least 2004 through 2024, the defendant—with assistance from employees and associates of businesses he controlled and ran, including a recording studio, a liquor brand, a clothing brand, a media company, and other lifestyle companies—allegedly committed multiple crimes intended to protect the defendant’s status and reputation and to satisfy the defendant’s personal desires. These alleged crimes included kidnapping, arson, bribery of a witness, obstruction of justice, drug distribution, forced labor, sex trafficking of multiple adult female victims who the defendant allegedly coerced to engage in sex acts with him and/or with male escorts, and the transportation of those victims and male commercial sex workers for purposes of engaging in commercial sex acts.

The Indictment charges the defendant in 5 counts: Count One of the Indictment charges the defendant with participating in a racketeering conspiracy during which he agreed with other employees and associates of his businesses to commit kidnapping, arson, bribery of a witness, obstruction of justice, drug distribution, forced labor, sex trafficking, and transportation for purposes of engaging in prostitution. Count Two charges the defendant with sex trafficking an adult female victim through force, fraud, and coercion. Count Three charges the defendant with transporting that female victim and male commercial sex workers to engage in prostitution. Count Four charges the defendant with sex trafficking a second adult female victim through force, fraud, and coercion. Count Five charges the defendant with transporting that second female victim and male commercial sex workers to engage in prostitution.

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Mr. Combs has pled not guilty to all charges. Mr. Combs is presumed innocent, and before he can be found guilty on any charge, the jury must find that the Government has proven each element of that crime beyond a reasonable doubt.

SCHEDULE

Potential jurors will be called back for further questioning and jury selection from Monday, May 5, 2025 through Friday, May 9, 2025. Your availability during that week will be required.

The trial will commence on Monday, May 12, 2025. The trial is expected to last about eight weeks. Generally, trial will be held five days per week, Monday through Friday. During the first week of trial from Monday, May 12, 2025 through Friday, May 16, 2025, trial will be held from 9:30 a.m. until 5:00 p.m. After the first week, trial will be held from 9:30 a.m. until 3:00 p.m. Trial will not be held on Friday, May 23, 2025 (Friday before Memorial Day), Monday, May 26, 2025 (Memorial Day), Thursday, June 19, 2025 (Juneteenth), or Friday, July 4, 2025 (Independence Day).

If you are selected as a juror, you will be required to be present for the taking of testimony and evidence for as long as the trial lasts. There are no plans to sequester the jury, which means you will go home every day after court.

All jury service involves some degree of hardship. Our court and justice system depends on citizens doing their civic duty to serve as jurors, which involves temporarily putting aside their regular business for jury service. The Court views service on a jury to be one of the highest duties a citizen owes to the United States. Mere inconvenience or the usual financial hardship of jury service will not be sufficient to excuse a prospective juror. You must show extraordinary personal or financial hardship to be excused from service.

(Please turn the page and read and complete the questionnaire.)

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DRAFT**ABILITY TO SERVE**

1.	<p>Do any circumstances exist such that serving on the jury in this case would entail <u>serious</u> hardship or <u>extreme</u> inconvenience?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please briefly describe the undue hardship or extreme inconvenience:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Please note: In the event you are excused from service on this jury, you will likely not be excused from jury service in general. You will instead be required to report to the Court's Jury Clerk for placement on another panel for another case.</p>
2.	<p>Do you have any personal commitments that would make it difficult for you to get to court by 9:30 a.m., every day of trial, or remain at the courthouse until [5:00 p.m.]?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain why you would be unable to get to court by 9:30 a.m. or remain until [5:00 p.m.]:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
3.	<p>Do you have any difficulty reading, speaking, or understanding English?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
4.	<p>Do you have any medical, physical, or mental condition or illness that makes you unable to serve on a jury, including difficulty hearing, seeing, reading, or concentrating?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please briefly describe the condition or illness. If you believe you could serve as a juror if such condition were accommodated in some way, please state the accommodation.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

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5.	<p>Are you taking any medication which would prevent you from giving full attention to all the evidence at this trial?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>
6.	<p>Do you have any pre-paid travel plans between May 12, 2025 and July 3, 2025?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe your plans and the dates of travel (without indicating the name of where you work or the names of any family members or friends, or other personal information that might identify who you are):</p> <p>_____</p> <p>_____</p> <p>_____</p>
7.	<p>Do you have any religious, philosophical, or other beliefs that would make you unable to render a verdict in a criminal case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>
8.	<p>The charges in this case involve allegations of kidnapping, arson, bribery of a witness, obstruction of justice, drug distribution, forced labor, sex trafficking, and transportation for purposes of engaging in prostitution. Is there anything about the nature of these allegations that would make it difficult for you to be fair and impartial?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

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BASIC LEGAL PRINCIPLES AND MEDIA RESTRICTIONS

9.	<p>Under the law, the facts are for the jury to determine, and the law is for the Judge to determine. You are required to accept the law as the Judge explains it to you even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Do you accept this principle, and will you be able to follow the Judge's instructions if selected to serve on this jury?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>
10.	<p>The law provides that a defendant in a criminal case is presumed innocent at all stages of the trial and is not required to put on any defense at all. The Government is required to prove the defendant guilty beyond a reasonable doubt on each charge. Do you accept these principles, and will you be able to apply them if selected to serve on this jury?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>
11.	<p>The law provides that a defendant in a criminal case has an absolute right not to testify, and that a juror cannot hold it against the defendant if he chooses not to testify. Do you accept this principle, and will you be able to apply it if selected to serve on this jury?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>

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12.	<p>A juror is required by law to make his or her decision based solely on the evidence or lack of evidence presented in Court, and not on the basis of conjecture, suspicion, bias, sympathy, or prejudice. Do you accept this principle, and will you be able to apply it if selected to serve on this jury?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>
13.	<p>Under the law, the question of punishment is for the Court alone to decide, and thus the issue of punishment must not enter into your deliberations as to whether the defendant is guilty or not guilty as charged. Do you accept this principle, and will you be able to apply it if selected to serve on this jury?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>
14.	<p>This case is likely to receive ongoing media attention. As instructed above, from now until your jury service is complete, you are instructed to avoid all media coverage and not to go on the Internet or social media with regard to this case for any purpose. That is, you are forbidden from consuming any news media or social media about this case, and from discussing this case (or anyone participating in the case) outside of the courtroom. You also must not discuss this case with anyone. This includes your family, friends, spouse, domestic partner, colleagues, and co-workers. These instructions apply from now and until you are either dismissed from jury selection or chosen as a juror and the trial is complete. When we return for the next step in jury selection, the Judge will ask you if you have followed this instruction.</p> <p>Do you have any reservations or concerns about your ability or willingness to follow this instruction?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>

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DRAFT**PRIOR JURY SERVICE**

15.	<p>Have you ever served as a juror in a trial in any court?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, without saying what the verdict was, did the jury reach a verdict?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
16.	<p>Have you ever served as a member of a grand jury in any court?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
17.	<p>Is there anything about your past jury service that would prevent you from acting as a fair and impartial juror in this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

RELATIONSHIP WITH PARTICIPANTS

18.	<p>Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with any of the following individuals?</p> <p>a. The defendant in this case, Sean Combs, or his family members</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. The Acting U.S. Attorney for the Southern District of New York, Matthew Podolsky, or anyone else who works for or used to work for the U.S. Attorney's Office for the Southern District of New York</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. Any of the Assistant United States Attorneys who are prosecuting this case:</p> <table> <tr> <td>Maurene Comey</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Meredith Foster</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Emily Johnson</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Christy Slavik</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Madison Smyser</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Mitzi Steiner</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table> <p>d. Any of the defense attorneys or law firms who are representing the defendant:</p>	Maurene Comey	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Meredith Foster	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Emily Johnson	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Christy Slavik	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Madison Smyser	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Mitzi Steiner	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Maurene Comey	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Meredith Foster	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Emily Johnson	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Christy Slavik	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Madison Smyser	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	
Mitzi Steiner	<input type="checkbox"/> Yes	<input type="checkbox"/> No																	

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	<p>Marc Agnifilo of Agnifilo Intrater LLP <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Teny Geragos of Agnifilo Intrater LLP <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Anna Estevao of Sher Tremonte LLP <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Alexandra Shapiro of Shapiro Arato Bach LLP <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Jason Driscoll of Shapiro Arato Bach LLP <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>e. The United States District Court Judge who is presiding over this case, Arun Subramanian, or anyone who works on his staff?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If you answered “yes” to any of the above sub-questions (14.a, 14.b, 14.c, 14.d, or 14.e), please explain whom you know, how you know the individual(s), and whether your relationship with that person might make it difficult for you to be a fair and impartial juror in this case:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

KNOWLEDGE OF CASE

This case and other matters involving Mr. Combs have been widely reported in the national and local media. There is nothing wrong with having seen or heard something about this case or about Mr. Combs. It is important to answer all of the following questions truthfully and fully.

19.	<p>Before today, had you read, seen, or heard anything about Mr. Combs or the criminal charges brought against Mr. Combs?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please summarize what you have learned and from where (i.e., from news reporting, social media, television, conversations with friends or family, etc.):</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
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20.	<p>Have you personally formed any opinion about Mr. Combs's guilt or innocence of the crimes charged as a result of anything you have heard, read, or seen?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p><input type="checkbox"/> Not applicable, I have not read/seen/heard about Mr. Combs</p> <p>If yes or unsure, please summarize your opinion:</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
21.	<p>Based on anything that you have read, seen, or heard about Mr. Combs, including anything about the criminal charges against Mr. Combs, have you formed any opinions about Mr. Combs that might make it difficult for you to be a fair and impartial juror in this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p><input type="checkbox"/> Not applicable, I have not read/seen/heard about Mr. Combs</p> <p>If yes or unsure, please summarize your opinion:</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
22.	<p>Have you communicated to others, or posted your opinion on social media or online, about Mr. Combs?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p><input type="checkbox"/> Not applicable, I have not read/seen/heard about Mr. Combs</p> <p>If yes, when and where did you state or post your opinion:</p>

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23.	<p>Based on anything you have read, seen, or heard about Mr. Combs, including anything about criminal charges brought against Mr. Combs, would you be able to follow the Court's instruction to put that information out of your mind and decide this case based only on the evidence presented at trial?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure </p> <p><input type="checkbox"/> Not applicable, I have not read/seen/heard about Mr. Combs</p> <p>If no or unsure, please summarize your opinion:</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

DECLARATION

I, Juror Number ____ declare under penalty of perjury that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire.

Signed this _____ day of _____, 2025

DO NOT WRITE YOUR NAME. PLEASE SIGN USING YOUR JUROR NUMBER.